

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

CMG WORLDWIDE, INC., and)
MARILYN MONROE, LLC,)

Plaintiffs,)

v.)

CASE NO. 1:05-cv-0423-DFH-WTL

BRADFORD LICENSING ASSOCIATES,)
THE SHAW FAMILY ARCHIVES, LTD.,)
and JAMES E. DOUGHERTY,)

Defendants.)

**DEFENDANT BRADFORD LICENSING
ASSOCIATES' 12 (B)(2) MOTION TO DISMISS
PLAINTIFFS' COMPLAINT FOR LACK OF PERSONAL JURISDICTION**

Defendant, Bradford Licensing Associates ("Bradford"), by counsel, pursuant to Rule 12(B)(2) of the Federal Rules of Civil Procedure respectfully moves the Court to dismiss Plaintiffs' Second Amended Complaint as to Bradford for lack of personal jurisdiction and in support states:

1. Bradford is a New Jersey Limited Liability Corporation with its primary place of business located at 209 Cooper Avenue, Upper Montclair, New Jersey.

2. Bradford's contacts with Indiana are and have been limited and do not relate to the transactions at issue in this lawsuit.

3. Bradfor does not have sufficient contacts with Indiana such that the exercise of jurisdiction over it comports with due process.

4. The exercise of jurisdiction over Bradford would be unreasonable under the circumstances.

5. In support of this Motion, Bradford submits its Memorandum of Law in Support of Its Motion to Dismiss.

WHEREFORE, Defendant, Bradford, respectfully requests that this Court dismiss Plaintiffs' Second Amended Complaint for lack of personal jurisdiction pursuant to Rule 12(B)(2) of the Federal Rules of civil Procedure and for all other just and appropriate relief.

Respectfully submitted,

/s/Hamish S. Cohen

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CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing document has been served on the following via the Court's electronic filing system this 5th day of July 2005:

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